

Appln. No. 09/770,577
Amdt. dated July 21, 2004
Reply to Office Action of Apr. 21, 2004
Docket No. 6169-145

IBM Docket No. BOC9-1999-0092

REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of April 21, 2004 (Office Action). As this amendment is timely filed within the three month shortened statutory period, no fee is necessary.

On page 2 of the Office Action, the Examiner has rejected claims 1-3, 5-11, and 13 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. U.S. Patent No. 6,125,341 to Raud, *et al.* (Raud).

As stated in the Applicants' response to the Examiner's November 4, 2003 Office Action, the Applicants' invention is directed to a method, system, and apparatus for completing a user input using speech recognition technology within a portable or embedded computing device. The invention allows a user input to be received, wherein the input specifies one or more characters corresponding to at least one recognizable word selection of a speech recognition system disposed within a portable computing device.

The one or more characters specified by the user input are compared with a set of selections within the speech recognition system (SRS). The set of selections of the SRS can be limited to an available set of selections based upon the comparing step. That is, the set of selections is limited to those selections that correspond with the one or more characters specified by the user.

A user-spoken utterance then can be received. The user-spoken utterance can be matched with one of the selections of the available set of selections to speech recognize the user spoken utterance. By limiting the possible recognizable selections, the present invention reduces the amount of processing power required thereby facilitating the use of the present invention within embedded and portable computing devices.

With regard to the rejections on the art, the Examiner has rejected claims 1-3, 5-11, and 13 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. U.S. Patent No. 6,125,341 to Raud. The Applicants respectfully disagree and maintain that Raud fails to disclose every feature of Applicants' invention. Raud, for example, fails to disclose limiting a set of selections to an available set of selections which correspond to a received user input, as recited in the Applicants independent claims.

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Raud discloses a speech recognition system having multiple recognition vocabularies, and a method of selecting an optimal working vocabulary used by the system. The selection of an optimal working vocabulary in Raud begins with an initial vocabulary that is moved from an inactive vocabulary memory to an active vocabulary memory of a speech recognition. (Col. 3, lines 32-34; Col. 4, lines 32-35, 62-65.) Raud then attempts to match a speech utterance to a word in the initial vocabulary based upon conventional speech recognition techniques (Col. 5, lines 15-21.) If a match can be made, a working vocabulary from the inactive vocabulary memory is moved into the active vocabulary memory, thereby replacing the initial vocabulary. (Col. 5, lines 39-44.) Additional substitutions in the active vocabulary may then be made, with each substitution replacing a prior working vocabulary with a new one that provides a better match between its stored words and the speech utterance.

Accordingly, Raud teaches searching for an optimal working vocabulary using an iterative process of replacing one vocabulary set with another. Nowhere, however, does Raud disclose limiting a vocabulary of words to a smaller selection of words of that vocabulary based on a user input. It follows, therefore, that Raud neither expressly nor inherently teaches or suggests limiting a set of selections to an available set of selections which correspond to a received user input as is taught by Applicants' invention. The replacement of one vocabulary by another as in Raud is simply not equivalent to limiting one vocabulary to a subset of its original words. Thus, Raud's substitution can not be read as the equivalent of limiting one set of selections to an available set of the selections, which as defined is not a different subset but rather a subset of the same set, as in the Applicants' invention.

Moreover, nothing in Raud even suggests that a working vocabulary that replaces either the initial vocabulary or another working vocabulary should comprise a smaller set of words than does the vocabulary that it replaces. Indeed, in referring to a mapping from the initial vocabulary to a list of vocabularies, Raud expressly states that "the number of words in [the initial] vocabulary need not equal the total number of vocabularies." (Col. 5, lines 62-64.) Whether or not a succeeding working vocabulary comprises a smaller set of words than the one it replaces is purely a matter of happenstance. The succeeding working vocabulary is just as likely to have more words than does the one it replaces. The Applicants respectfully emphasize that inherency

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T-028 P.10/10 F-035

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can not be established by such probabilities or mere possibilities. *In re Robertson*, 169 F.3d 743, 745 (Fed. Cir. 1999).

Independent Claim 1 of the present application recites limiting a set of selections to an available set of selections which correspond to a specified at least one character. Independent Claim 6 recites limiting a set of selections to an available set of selections. These are among the features of the features of the invention that Raud fails to disclose, either expressly or inherently. Accordingly, the Applicants respectfully request a withdrawal of the Examiner's rejection under 35 U.S.C. § 102(e). The Applicants also respectfully request a withdrawal of the rejection of the dependent Claims 2, 3, and 5, since each depends from Claim 1 and recites additional features.

The Applicants respectfully note that at page 3 of the Office Action the Examiner has stated that "Claims 7-11 and 13 are analogous to [C]laims 1-6 and are rejected for the foregoing reasons by Kawasaki *et al.*" Since the Office Action states at page 2 that the application is sufficient "to overcome the earlier-cited Wakisaka and Kawasaki references," the Applicants have inferred that these claims, too, have been rejected on the basis of Raud. Therefore, for the reasons already stated, the Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejection with respect to each of independent Claims 7 and 9 as well as dependent claims 8, 10, 11, and 13.

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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- 8 -